

Exhibit C

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By Electronic Mail

March 6, 2015

Sean Carter, Esquire
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28 Bridgeside Boulevard
Mount Pleasant, SC 29465

Re: *In re Terrorist Attacks*, MDL No. 03-1570 (GBD) (FM).

Dear Sean and Robert:

I write in response to your email of March 5, 2015. As a threshold matter, we have repeatedly advised you that if any defendant has produced documents in 2015, that the proposed deadline for briefing motions to compel as to those productions would be adjusted if plaintiffs had any concerns about the 2015 productions. Thus, there is no reason to delay any further in setting a briefing schedule for the productions made prior to 2015 – productions that already encompass over 610,000 pages, with over 65 percent produced more than seven months ago.

Moreover, as we have advised you, if any party (whether plaintiff or defendant) comes across overlooked documents, or obtains new documents not available at the time of its prior productions, that party has the unfettered right under Rule 26(e)(1)(A) to supplement its production as needed.

That said, I have canvassed the other defense counsel and can confirm that of the defendants currently in discovery, all but one have completed their production, and one other defendant will be supplementing its production.

Sean Carter, Esquire
Robert Haefele, Esquire
March 6, 2015
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AHIF-USA has already produced over 80,000 pages of documents through September 2013. There are some court filings subsequent to that date and other public records, and I will be supplementing our production shortly, pursuant to Rule 26(e)(1)(A), although I suspect that you already have those court filings.

As you know, Dallah Avco has already produced what it believes to be the substantial majority of responsive documents. Dallah Avco is still in the process of reviewing certain files from an offsite storage facility at Dallah City, a process that was delayed by difficulties retrieving the documents. Dallah Avco has already produced the most relevant file from that facility (the "Omar al Bayoumi" file) and is continuing to process the remaining files, the vast majority of which are not expected to contain any responsive documents.

Therefore, we reiterate our request that you promptly provide us with plaintiffs' response to the proposed schedule for motions to compel and supplementing initial disclosures as set forth in the February 27, 2015 draft letter, which encompasses our proposal during the February 23 meet-and-confer session. There is no reason to delay any further in setting these deadlines.

Sincerely,

/s/ Alan

Alan R. Kabat

cc: MDL-1570 counsel
(by e-mail)